



**Vermont Solid Waste Regulations
Resource Management, Inc. (RMI) Comments
Comments Due by April 21, 2020
Submitted via Email to Dennis.Fekert@vermont.gov**

April 7, 2020

RMI appreciates the use of more positive use of terms in the rules regarding the use of biosolids and septage, for example using “land application site” in place of “diffuse disposal facility” and replacing “waste” with “biosolids” in certain instances.

§6-1303 (a)(2)

We urge the Agency to consider including all EPA Class A Alternatives, not just 1,2,5 and 6 as it applies to EQ biosolids pathogen reduction requirements. Aligning with the EPA Part 503 Biosolids Regulations would allow for the beneficial reuse of Class A biosolids that are confirmed low in pathogens by testing, without having to go through an additional expensive treatment process.

§6-1303 (b)(2)

Recommend increasing the net weight from 50lbs up to 2000lbs to enable the use of agricultural super sacs. These 1-ton sacs are used by golf courses and athletic fields with Milrogonite and other fertilizers.

§6-1303 (b)(3)

The rule referenced at the end “6-1304(a),(g), and (i)(3)” does not exist.

These comments are respectfully submitted by RMI. We welcome the opportunity to discuss in more detail, or to answer any questions. Please contact:

April Sargent, Compliance Assistant

April.Sargent@RMIrecycles.com